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Attorneys for Plaintiff  
LISA CORSON

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

LISA CORSON,

Plaintiff,

vs.

GREATER PALM SPRINGS  
TOURISM FOUNDATION DBA  
GREATER PALM SPRINGS  
CONVENTION AND VISITORS  
BUREAU,

Defendant.

**Case Number:** 5:22-cv-00736-SPG-  
PVC

**DECLARATION OF MATTHEW  
L. ROLLIN**

I, Matthew L. Rollin, declare and say:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for Plaintiff LISA CORSON (“Corson”) in the above-captioned matter. I provide this Declaration in support of Corson’s Motion

1 to Strike Defendant's Affirmative Defenses. I have personal knowledge of  
2 the facts stated herein, and if called as a witness, I could and would testify  
3 competently to the matters set forth herein.

4 2. On June 23, 2022, Defendant Greater Palm Springs Tourism  
5 Foundation dba Greater Palm Springs Convention and Visitors Bureau  
6 ("GPSTF") filed its answer. (ECF 25).

7 3. On July 5, 2022, Defendant's Counsel informed Plaintiff's  
8 Counsel that GPSTF was turning the matter over to its insurance carrier and  
9 does not know what his continued involvement would be.

10 4. On July 11, 2022, Plaintiff's Counsel requested a thirty (30)  
11 day extension to file a motion to strike affirmative defenses while GPSTF  
12 worked out details with its insurance carrier.

13 5. On July 14, 2022, Parties filed a stipulation extending the time  
14 for Plaintiff to file a motion to strike affirmative defenses. (ECF 28).

15 6. On July 25, 2022, Plaintiff's Counsel emailed Defendant's  
16 counsel regarding whether insurance had picked up the case and if he was  
17 going to remained involved.

18 7. On July 25, 2022, Plaintiff's counsel received an out of office  
19 from Defendant's counsel saying he was out of the office until August 15,  
20 2022.

21 8. On July 30, 2022, Defendant's counsel emailed Plaintiff's  
22 counsel informing that GPSTF was still waiting to hear back from insurance.

23 9. On August 1, 2022, Plaintiff's counsel emailed Defendant's  
24 counsel requesting a time to meet and confer on this motion. Plaintiff's  
25 counsel did not receive a response.

26 10. On August 3, 2022, Plaintiff's counsel emailed Defendant's  
27 counsel requesting a time to meet and confer on this motion. Plaintiff's  
28 counsel did not receive a response.

11. On August 5, 2022, Plaintiff's counsel emailed Defendant's counsel requesting a time to meet and confer on this motion. Plaintiff's counsel did not receive a response.

12. On August 8, 2022, Plaintiff's counsel emailed Defendant's counsel requesting a time to meet and confer on this motion.

13. On August 11, 2022, Defendant's counsel responded to Plaintiff's counsel and on August 12, 2022, counsel spoke regarding this matter.

14. On August 12, 2022, Defendant's counsel requested a two-week extension for our motion to strike affirmative defense as he believed that the additional time could facilitate settlement discussions.

15. Defendant's counsel informed Plaintiff's counsel that he would get back to us early next week (Week of August 15).

16. On August 12, 2022, the Parties filed a stipulation for a two-week extension to file the motion to strike affirmative defenses and it was granted by the Court on August 15. (ECF 32 & 33).

17. On August 18, August 22, August 26 and August 29, Plaintiff's counsel followed up with Defendant's counsel, requesting to meet and confer on this motion, an update on the status of settlement, and if Defendant would be willing to amend its affirmative defenses.

18. On August 29, Plaintiff's counsel was informed that Defendant's counsel was out of the office traveling and would contact Plaintiff's counsel on August 30.

I declare under perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 29, 2022.

/s/ Matthew L. Rollin  
Matthew L. Rollin